



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

November 21, 2019

**BY ECF**

The Honorable Richard M. Berman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Richard Gaffey and Harald Joachim von der Goltz*, 18 Cr. 693 (RMB)

Dear Judge Berman:

The Government respectfully submits this letter regarding scheduling in this case. On November 19, 2019, a grand jury returned a superseding indictment against the defendants, including one new count against defendant Richard Gaffey. The Government and the defense have met and conferred regarding scheduling an arraignment on the charges in the superseding indictment. To accommodate the scheduling needs of the parties and defense counsel, the parties jointly request that the Court schedule the arraignment for January 6, 2020 at 11:00 a.m., during the pretrial conference that is already scheduled in this case.

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Because the purpose of this proposed schedule is to accommodate the schedules of the defendants and counsel, the parties jointly submit that the ends of justice served by the proposed schedule outweigh the best interests of the public and the defendant in a speedy trial, and request that the Court accordingly exclude time under 18 U.S.C. 3161(h)(7)(A) and (B), from November 21, 2019, until January 6, 2020. The Government has met and conferred with defense counsel, who consents to these requests.

Respectfully submitted,

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cc: Defense Counsel (by ECF)